

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
sgizer@earlysullivan.com

2 Sophia S. Lau, Esq., Nevada Bar No. 13365
slau@earlysullivan.com

3 EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

4 8716 Spanish Ridge Avenue, Suite 105
Las Vegas, Nevada 89148

5 Telephone: (702) 331-7593
Facsimile: (702) 331-1652

6 Kevin S. Sinclair, NV Bar No. 12277
ksinclair@sinclairbraun.com

7 SINCLAIR BRAUN LLP
8 16501 Ventura Blvd, Suite 400
Encino, California 91436
9 Telephone: (213) 429-6100
Facsimile: (213) 429-6101

10 Attorneys for Defendants

11 FIDELITY NATIONAL TITLE GROUP, INC., CHICAGO
TITLE INSURANCE COMPANY, and TICOR TITLE OF
12 NEVADA, INC.

13 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

14 Gary L. Compton, State Bar No. 1652
2950 E. Flamingo Road, Suite L
15 Las Vegas, Nevada 89121

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 DEUTSCHE BANK NATIONAL TRUST
COMPANY,

20 Plaintiff,

21 vs.

22 CHICAGO TITLE INSURANCE
COMPANY et al.,

24 Defendants.

Case No.: 2:21-CV-01854-GMN-DJA

25 **STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

26 **THIRD REQUEST**

27 COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”), Chicago Title
Insurance Company (“Chicago Title”) and Ticor Title of Nevada, Inc. (“Ticor Agency”)
28 (collectively “Defendants”) and plaintiff Deutsche Bank National Trust Company (“Deutsche

1 Bank”), by and through their respective attorneys of record, which hereby agree and stipulate as
2 follows:

3 1. On October 6, 2021 Deutsche Bank filed its complaint in the Eighth Judicial
4 District Court for the State of Nevada;

5 2. On October 6, 2021, Chicago Title removed the instant case to the United States
6 District Court for the State of Nevada (ECF No. 1);

7 3. On January 19, 2022, the parties submitted the first stipulation for an extension of
8 time for Defendants to respond to Deutsche Bank’s complaint, which was granted by the Court on
9 January 20, 2022 (ECF No. 24);

10 4. On February 23, 2022 the parties submitted the second stipulation for an extension
11 of time for Defendants to respond to Deutsche Bank’s complaint, which was granted by the Court
12 on February 24, 2022 (ECF No. 26);

13 5. Counsel for Defendants request a further 31-day extension for Defendants to file
14 their respective responses to Deutsche Bank’s complaint, through and including Monday, April
15 25, 2022, to afford Defendants’ counsel additional time to review and respond to Deutsche Bank’s
16 complaint.

17 6. Counsel for Deutsche Bank does not oppose the requested extension;

18 7. This is the third request for an extension made by counsel for Defendants, which is
19 made in good faith and not for the purposes of delay.

20 8. This stipulation is entered into without waiving any of Defendants’ objections
21 under Fed. R. Civ. P. 12.

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Monday, April 25, 2022.

3 Dated: March 21, 2022

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 FIDELITY NATIONAL TITLE GROUP,
INC., CHICAGO TITLE INSURANCE
COMPANY, and TICOR TITLE OF
NEVADA, INC.

9 Dated: March 21, 2022

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Lindsay D. Dragon

12 LINDSAY D. DRAGON
13 Attorneys for Plaintiff
14 DEUTSCHE BANK NATIONAL TRUST
COMPANY

IT IS SO ORDERED.

15 Dated this 22nd day of March, 2022.

16 
17 DANIEL J. ALBREGTS
18 UNITED STATES MAGISTRATE JUDGE